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March 15, 2020

***Via ECF & Email***

The Honorable Katherine P. Failla  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

Re: *United States v. Danielle Panzarino*, 16 Cr. 290 (KPF)

Dear Judge Failla:

We write to respectfully request that the Court permit Ms. Panzarino to travel to and reside in Florida for one month to help care for her ailing mother.

On June 7, 2019, the Court sentenced Ms. Panzarino to time served plus one month of incarceration to be followed by eighteen months of supervised release, six months of which was to be served at an inpatient treatment facility. *See* ECF No. 76. In January 2020, Ms. Panzarino successfully completed six months of inpatient treatment and commenced normal supervised release.

Since commencing supervised release on July 5, 2019, Ms. Panzarino has been diligently seeking treatment for her various health issues. In doing so she has been diagnosed with additional serious conditions. The defense plans to request early termination of Ms. Panzarino's supervised release after she has completed twelve months of supervision. In the meantime, we are respectfully requesting that the Court permit Ms. Panzarino to travel to West Palm Beach, Florida to reside with her sick mother for one month.

Ms. Panzarino's mother, who suffers from Chronic Obstructive Pulmonary Disease ("COPD") and Emphysema, receives oxygen therapy twenty-four hours a day and it is at high risk for contracting the Coronavirus. Ms. Panzarino has not seen her mother in years and is anxious to spend time with her before it is too late. Additionally, due to her compromised immune system, Ms. Panzarino also has a high risk for contracting the Coronavirus. Residing outside of New York City would help decrease her exposure risk given New York's population density. If this application is granted, we will provide Ms. Panzarino's probation officer with Ms. Panzarino's mother's address in West Palm Beach, Florida, where she will be residing.

Accordingly, we respectfully request Ms. Panzarino be permitted to travel to and reside in Florida for one month. We thank the Court for its consideration.

Respectfully submitted,

/s/

César de Castro  
Valerie A. Gotlib

cc: AUSA Thomas McKay (*Via* ECF & E-mail)

Application GRANTED, with the Court's understanding that the Government does not object.

Dated: March 18, 2020  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE